

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO

UNITED STATES OF AMERICA

Plaintiffs,

vs.

CIVIL NO. **14-CV-1476 (CCC)**

THE MUNICIPALITY OF SAN JUAN,
ET. AL.

Defendants.

MOTION REQUESTING ADDITIONAL EXTENSION OF TIME TO ANSWER
AMENDED COMPLAINT

TO THE HONORABLE COURT:

COMES NOW the above-named Defendant, the **Municipality of San Juan** (hereinafter the “Municipality”), through the undersigned counsel, and most respectfully STATES and PRAYS:

As reflected by the record, the Municipality has requested several extensions of time to respond to the *Amended Complaint* filed by the United States on November 21, 2014 (Docket No. 20)

As also reflected by the record, the Municipality has been engaged in settlement discussions with the United States, aimed at the possible settlement of all claims brought against the Municipality.

Motion Requesting Additional Extension...

Case No.: **14-CV-1476 (CCC)**

Page 2

In light of the foregoing, the Municipality hereby requests an additional term of fifteen (15) days to answer the *Amended Complaint*, or otherwise plead, to expire on March 2, 2015.

WHEREFORE, the Municipality hereby requests that this Honorable Court take notice of the aforementioned, and grant the extension of time sought herein.

RESPECTFULLY SUBMITTED.

In San Juan, Puerto Rico, this 13th day of February, 2015.

WE HEREBY CERTIFY: that on this date, we electronically filed the foregoing motion with the Clerk of the Court using the CM/ECF system that will send notification of such filing to all attorneys of record registered in the use of the CM/ECF system.

EDGE Legal Strategies, P.S.C.
252 Ponce de León Ave.
Citibank Tower, 12th Floor
San Juan, Puerto Rico 00918
Tel. (787) 522-2000
Fax (787) 522-2010

S/Eyck O. Lugo
EYCK O. LUGO, ESQ.
USDC No. 216708
E-mail: elugo@edgelegalpr.com